

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW Room TW-A325

Re: WT Docket 09-217

To: The Commission

Citrus County Fire Rescue is responsible for providing fire rescue, fire prevention, hazardous materials, and technical rescue services to a county of 660 square miles and over 130,000 citizens. Citrus County has one of the largest combination fire rescue systems in the State of Florida. The agency has over 200 career and volunteer members working out of twenty-two fire rescue stations.

Citrus County Fire Rescue is both a Type II Hazmat Regional Response team and a Type II Technical Response Team for the State of Florida. Citrus County Fire Rescue has 23 engine companies, 2 aerial companies, 22 brush trucks, 11 tankers, 11 rescue companies, and a marine unit with 6 boats used to fight marine fires and water rescue in the County's 189 miles of inland waterways and the Gulf of Mexico.

Citrus County currently alerts their first responders with a low-band voice system utilizing Motorola Minitor V pagers. Although this system has provided a means to alert

our first responders, it lacks the advanced features that a two-way system could provide us, such as faster message delivery, delivery acknowledgement, and reply capabilities.

However, until the WT 09-217 NPRM was published and comments filed, we had no idea this type of system was even an option for us. In fact, our understanding was that two-way paging was not an option at all. In that respect, this proceeding has been educational. But even now, knowing it is theoretically possible for us to obtain a section 337(c) waiver to build a two-way paging system, and understanding the clear benefits of this type of system as compared to older technologies, we would still hesitate before constructing a two-way paging system. We feel a more proactive approach to this situation is necessary by creating a national plan that coordinates control channels and mobile unit programming as necessary rather than fixing the problem after multiple networks have been deployed and interoperability problems surface. Our voice communications systems have suffered due to the lack of planning upfront. This reactionary approach only magnifies the problems, adds barriers and delays to interoperability, and inevitably increases the costs to local governments. Such plans ensure we get the maximum value out of our investment and get vendors and users all together "on the same page." But at present, for two-way paging talk-back channels, public safety has no idea what spectrum to use or that this spectrum is even available.

Do not take "lack of demand" as a reason to not proceed with the NPSTC request. This is a red herring. Public Safety's demand for paging – all types of paging – is strong and constant, and there is no reason to believe this demand will mysteriously stop with these new and important capabilities. Instead, help NPSTC find talk-back channels and establish a national plan to guide the construction and operation of two-way paging systems. If managed correctly, we believe two-way paging systems could significantly improve the safety of life, health, and property.

Please proceed as directed by the NPSTC.

Sincerely

A handwritten signature in dark ink, appearing to read "Jim Goodworth". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Jim Goodworth
Deputy Fire Chief
Citrus County Fire Rescue
3600 W Sovereign Path
Lecanto, FL 34461